

[REDACTED]

[REDACTED]

From: Peter Leyton

Sent: Wednesday, February 26, 2020 9:24 PM

To: Michelle Edwards <medwards@acics.org>

Subject: RE: Michelle Edwards shared "Michelle Bonocore" with you

Thanks Michelle. Any chance we can talk about this matter tomorrow morning? I left a voicemail for Ken earlier today. Saqi Barzani is grossly defaming Stratford University, Dr. Shurtz and Mrs. Shurtz, using Stratford trademarks without authorization and in violation of a cease and desist letter from the University's intellectual property counsel and misleading ACICS. The action just taken by ACICS directing the institution to immediately cease enrolling new students threatens to jeopardize the institution itself, without adequate process. The video was not made for marketing purposes. It was news that the school might be coming to Erbil and the interview was conducted by Rudaw, a cable news network in Kurdistan. We don't know if that video interview was edited in any way to be misleading but it is something we want to investigate. The language you heard on the video that is referenced in today's letter to Dr. Shurtz was not a reference to the "Erbil campus" being fully accredited. It was a reference to the institution in the United States and its programs. We simply ask that you not take this immediate action without process but permit the University to provide you with a response by March 10 as part of the show cause response.

I am hoping to provide you with a more complete statement tomorrow but with a

directive to act within 24 hours I am compelled to make this request, respectfully, now, and hope to hear from you soon.

Regards, Peter

Peter S. Leyton

Gombos | Leyton, P.C.

11350 Random Hills Road, Suite 400

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From: Michelle Edwards <medwards@acics.org>

Sent: Wednesday, February 26, 2020 6:46 PM

To: Peter Leyton <PLeyton@glpclaw.com>

Subject: RE: Michelle Edwards shared "Michelle Bonocore" with you

Added. Sorry, this went to my junk and I'm just now seeing it. Let me know if you have any issues accessing the documents.

From: Peter Leyton <PLeyton@glpclaw.com>

Sent: Wednesday, February 26, 2020 4:13 PM

To: Michelle Edwards <medwards@acics.org>

Subject: RE: Michelle Edwards shared "Michelle Bonocore" with you

Thanks Michelle. I don't have enough space on my desktop. Can you add access for Jessicas@glpclaw.com and stchema@glpclaw.com. Thanks.

Peter S. Leyton

Gombos | Leyton, P.C.

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From: Michelle Edwards (via Dropbox) <no-reply@dropbox.com>

Sent: Wednesday, February 26, 2020 4:02 PM

To: Peter Leyton <PLeyton@glpclaw.com>

Subject: Michelle Edwards shared "Michelle Bonocore" with you



Hi Peter,

Michelle Edwards (medwards@acics.org) invited you to view the folder
"Michelle Bonocore" on Dropbox.

[Go to folder](#)

Enjoy!

The Dropbox team

[Report to Dropbox](#)

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